

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC,
PATENT LITIGATION

THIS DOCUMENT RELATES TO
CASE NO. 2:22-cv-00427-JRG

§
§
§
§
§
§
§

Case No. 2:22-md-03042-JRG

JURY TRIAL DEMANDED

TAASERA LICENSING LLC,

Plaintiff,

v.

MUSARUBRA US LLC, D/B/A TRELLIX,

Defendant.

§
§
§
§
§
§
§
§
§
§
§

Case No. 2:22-cv-00427-JRG

JURY TRIAL DEMANDED

JOINT MOTION TO FURTHER EXTEND THE STAY OF ALL DEADLINES

Plaintiff Taasera Licensing LLC (“Plaintiff” or “Taasera”) and Defendant Musarubra US LLC, d/b/a Trellix (“Trellix” or “Defendant”) (collectively, the “Parties”) hereby file this Joint Motion to Further Extend the Stay of All Deadlines.

All matters in controversy between the Parties have been settled in principle and, on January 4, 2024, the Parties jointly moved to stay all deadlines and provided notice of settlement (Dkt. 347). On January 5, 2024, this Court stayed the case until February 9, 2024 (Dkt. 349). On February 8, 2024, the Parties filed a Joint Motion to Extend the Stay of All Deadlines for thirty (30) days (Dkt. 352). On March 7, 2024, the Parties filed a Joint Motion to Further Extend the Stay of All Deadlines for thirty (30) days (Dkt. 358). On March 8, 2024, this Court granted the extension until April 10, 2024 (Dkt. 74 in the Member Case).

The Parties recognize the significant amount of time that has been spent consummating the settlement. The Parties respectfully and jointly request that the Court extend the stay of all case deadlines for seven additional days. The settlement agreement has been finalized and executed. As agreed in the settlement agreement, dismissal of the case requires certain performance which has yet to occur. The Parties expect such performance to occur within the next 48 hours, but request seven days to avoid the need to request any additional extension of the stay. The Parties do not anticipate requesting another stay of this action from the Court.

WHEREFORE, the Parties respectfully request that the Court enter the proposed order submitted with this motion as set forth above.

Dated: April 10, 2024

Respectfully submitted,

/s/ Alfred R. Fabricant

Alfred R. Fabricant

NY Bar No. 2219392

Email: ffabricant@fabricantllp.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@fabricantllp.com

Joseph M. Mercadante

NY Bar No. 4784930

Email: jmercadante@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue,

Suite 206 South

Rye, New York 10580

Telephone: (212) 257-5797

Facsimile: (212) 257-5796

Justin Kurt Truelove
State Bar No. 24013653
Email: kurt@truelovelawfirm.com
TRUELOVE LAW FIRM, PLLC
100 West Houston Street
Marshall, Texas 75670
Telephone: (903) 938-8321
Facsimile: (903) 215-8510

Samuel F. Baxter
State Bar No. 01938000
Email: sbaxter@mckoolsmith.com
Jennifer L. Truelove
State Bar No. 24012906
Email: jtruelove@mckoolsmith.com
MCKOOL SMITH, P.C.
104 E. Houston Street, Suite 300
Marshall, Texas 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

***ATTORNEYS FOR PLAINTIFF
TAASERA LICENSING LLC***

/s/ Nathaniel St. Clair, II (with permission)
Nathaniel St. Clair, II
State Bar No. 24071564
Email: nstclair@jw.com
JACKSON WALKER LLP
2323 Ross Avenue, Suite 600
Dallas, Texas 75201
Telephone: (214) 953-5948
Facsimile: (214) 661-6848

***ATTORNEY FOR MUSARUBRA US LLC, d/b/a
TRELLIX***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on April 10, 2024, a true and correct copy of the foregoing document has been served via electronic mail on all counsel of record.

/s/ Alfred R. Fabricant
Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that all counsel of record has met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Alfred R. Fabricant
Alfred R. Fabricant